

**Federal Defenders  
OF NEW YORK, INC.**

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David E. Patton  
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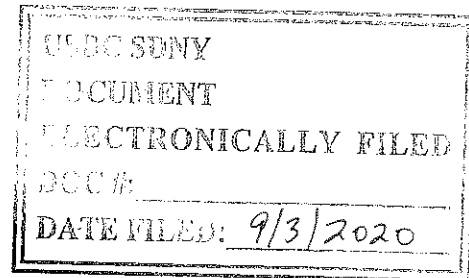
Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

September 2, 2020

**BY EMAIL AND ECF**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE: United States v. Mikal Leahr**  
**20 Cr. 61 (RMB)**



Dear Judge Berman:

I write on behalf of my client, Mikal Leahr, with the consent of the Government, to respectfully request a 60-day adjournment of the conference in the above-referenced case.

We have been unable to meet with Mr. Leahr, review discovery, and discuss his defense in this case. Our ability to collect necessary records and discuss a disposition with the government has also been impacted. In consequence, we respectfully request that the Court adjourn the conference currently scheduled for September 14 for 60 days to allow counsel and Mr. Leahr adequate time to prepare and discuss the case with each other and the Government. Mr. Leahr's case in front of Judge Stein, 19 Cr. 913 (SHS), was adjourned for 60 days, to November 13. For scheduling purposes, I note that I am unavailable before 1:00 on Tuesdays.

The Government requests that time from September 14 until the adjourn date be excluded from any Speedy Trial calculations. On behalf of Mr. Leahr, I consent to that request.

Thank you for your time and consideration of this matter.

Conference is adjourned to  
November 16, 2020 at 9:30am.  
Time is excluded pursuant  
to the Speedy Trial Act for  
the reasons set forth in this  
letter.

Cc: AUSA Kevin Sullivan

SO ORDERED:

Date: 9/3/2020

Richard M. Berman  
Richard M. Berman, U.S.D.J.

Respectfully submitted,

/s/

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